

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
CRAIG ALLEN ZIMMERMAN :
MEREDITH ANN ZIMMERMAN :
Debtor :
JACK N. ZAHAROPOULOS :
STANDING CHAPTER 13 TRUSTEE :
Movant :
CRAIG ALLEN ZIMMERMAN : CASE NO. 1-24-bk-02592
MEREDITH ANN ZIMMERMAN :
Respondent

TRUSTEE'S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

AND NOW, this this 13th day of January 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. Failure to properly state the minimum amount to be paid to unsecured creditors in Section 1.A.4. of the Plan, as required by the Means Test.
2. The Trustee avers that Debtor(s)' Plan is not feasible based upon the following:
 - a. Secured claims not in Plan, specifically, Claim 7-1.
3. Trustee avers that Debtor(s)' Plan cannot be administered due to the lack of the following:
 - a. Pay stubs for the months of November and December 2024 for Debtor #1.

WHEREFORE, Trustee alleges and avers that Debtor(s) Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s) Plan.
- b. Dismiss or convert Debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 13th day of January 2025, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

CIBIK LAW, PC
1500 WALNUT STREET, SUITE 900
PHILADELPHIA, PA 19102-

/s/Tammy Life
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee